

THE HONORABLE THOMAS S. ZILLY

U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

STRIKE 3 HOLDINGS, LLC, a Delaware  
corporation,

Plaintiff,

vs.

JOHN DOE, subscriber assigned IP  
address 73.225.38.130,

Defendant.

JOHN DOE subscriber assigned IP  
address 73.225.38.130,

Counterclaimant,

vs.

STRIKE 3 HOLDINGS, LLC,

Counterdefendant.

NO. 2:17-cv-01731-TSZ

**DECLARATION OF ADRIENNE D.  
MCENTEE IN SUPPORT OF  
DEFENDANT'S SUPPLEMENTAL  
RESPONSE TO MOTION FOR  
SUMMARY JUDGMENT**

I, Adrienne D. McEntee, declare as follows:

1. I am a member of Terrell Marshall Law Group PLLC ("TMLG") and counsel of record for Defendant, John Doe, in this matter. I have personal knowledge of the facts set forth

DECLARATION OF ADRIENNE D. MCENTEE IN  
SUPPORT OF DEFENDANT'S SUPPLEMENTAL  
RESPONSE TO MOTION FOR SUMMARY  
JUDGMENT DECLARATION OF ADRIENNE D.  
MCENTEE IN SUPPORT OF DEFENDANT'S  
SUPPLEMENTAL RESPONSE TO MOTION FOR  
SUMMARY JUDGMENT - 1  
CASE No. 2:17-cv-01731-TSZ

1 in this declaration. I am submitting this declaration in support of Defendant's Supplemental  
2 Response to Plaintiff's Motion for Summary Judgment.

3 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the  
4 deposition of John Pasquale taken on April 17, 2019.

5 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the  
6 deposition of Susan Stalzer taken on April 16, 2019.

7 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the  
8 deposition of Tobias Fieser taken on May 9, 2019.

9 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the  
10 deposition of Jessica Fernandez taken on April 12, 2019.

11 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the  
12 deposition of Jessica Fernandez taken on April 12, 2019, which Plaintiff has designated  
13 "confidential" and have been filed under seal pending the outcome of Defendant's Motion to  
14 File "Confidential" Documents Under Seal or in Open Court.

15 7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's Objections  
16 and Responses to Defendant's Fourth Set of Requests for Production of Documents dated June  
17 19, 2019.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of the transcript of the  
19 May 31, 2019 hearing regarding Defendant's Motion to Quash filed in *Strike 3 Holdings, LLC*  
20 *v. John Doe Subscriber Assigned IP Address 73.160.162.60*, U.S. District Court for the District  
21 of New Jersey, Docket No. 18-14114.

22 9. Attached hereto as Exhibit 8 is a true and correct copy of email correspondence  
23 between J. Curtis Edmonson and Lincoln Bandlow dated April 9, 2018.

24 10. Attached hereto as Exhibit 9 is a true and correct copy of email correspondence  
25 between Lincoln Bandlow and J. Curtis Edmonson dated April 10, 2018.

26  
27 DECLARATION OF ADRIENNE D. MCENTEE IN  
SUPPORT OF DEFENDANT'S SUPPLEMENTAL  
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12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the deposition of John Doe's Son taken on June 3, 2019. All personally identifying information has been redacted pursuant to the Court's Minute Order dated March 5, 2018 [ECF 20].

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the deposition of Greg Lansky taken on April 11, 2019. Portions of this document have been designated “confidential” and have been filed under seal pending the outcome of Defendant’s Motion to File “Confidential” Documents Under Seal or in Open Court.

14. Strike 3 did not produce PCAPs until 2019.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in Seattle, Washington, this 24th day of June, 2019.

By: /s/ Adrienne D. McEntee, WSBA #34061  
Adrienne D. McEntee, WSBA #34061

DECLARATION OF ADRIENNE D. MCENTEE IN  
SUPPORT OF DEFENDANT’S SUPPLEMENTAL  
RESPONSE TO MOTION FOR SUMMARY  
JUDGMENT - 3

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CERTIFICATE OF SERVICE

I, Adrienne D. McEntee, hereby certify that on June 24, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*Attorneys for Non-Party John Doe's Son*

DECLARATION OF ADRIENNE D. MCENTEE IN  
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12 *Attorneys for Attorneys for Third-Party Witnesses Tobias Fieser, IPP*  
*International UG, Bunting Digital Forensics, LLC, Stephen M. Bunting*

13 DATED this 24th day of June, 2019.  
14

15 TERRELL MARSHALL LAW GROUP PLLC

16 By: /s/ Adrienne D. McEntee, WSBA #34061  
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DECLARATION OF ADRIENNE D. MCENTEE IN  
SUPPORT OF DEFENDANT'S SUPPLEMENTAL  
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